

EXHIBIT 2

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ELECTRONICALLY FILED
Superior Court of California,
County of Orange
07/24/2018 at 03:14:29 PM
Clerk of the Superior Court
By Mary M Johnson, Deputy Clerk

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8 Attorney for Plaintiff
9 NATALIE LAMBERT

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

12 NATALIE LAMBERT,
13
14 Plaintiff,

15 v.

16 UNIREGISTRY, INC., a Delaware
17 corporation; SEVAN DERDERIAN;
18 DOES I through X, inclusive,
19 Defendants.

)
) CASE NO. 30-2018-01007644-CU-OE-CJC
) Judge Theodore Howard
) COMPLAINT FOR SEXUAL HARASSMENT
) (GOV. CODE, § 12940(j));
) RETALIATION (GOV. CODE, § 12940(h));
) JURY TRIAL DEMAND

19 Plaintiff alleges:

20 SUMMARY OF CLAIMS

21 1. This is an action for damages by plaintiff against her former
22 employer and supervisor based on an egregious bad faith course of
23 conduct in which plaintiff was harassed, belittled, humiliated and
24 sabotaged in her work duties based on her gender, and was subject to
25 adverse action, including termination, because she engaged in the
26 protected activity of protesting such harassment. Plaintiff seeks

27 1

28 COMPLAINT FOR SEXUAL HARASSMENT (GOV. CODE, § 12940(j)); RETALIATION
(GOV. CODE, § 12940(h)); JURY TRIAL DEMAND

EXHIBIT 2

1 compensatory damages, including economic damages for past and future
 2 loss of earnings and benefits, general damages for emotional distress,
 3 punitive damages, and statutory attorneys' fees.

4 PARTIES

5 2. At all times herein mentioned plaintiff NATALIE LAMBERT
 6 (hereinafter "plaintiff") was a resident of the State of California.
 7 Since July of 2015, plaintiff has resided in Palm Beach County,
 8 Florida.

9 3. Plaintiff is informed and believes and based on such
 10 information and belief alleges that at all times herein mentioned
 11 defendant UNIREGISTRY, INC. (hereinafter "UNIREGISTRY") was and is a
 12 Delaware corporation engaged in business as an internet domain
 13 platform, with its principal place of business located in the County
 14 of Orange, State of California.

15 4. Plaintiff is further informed and believes and based on such
 16 information and belief alleges that at all times herein mentioned
 17 defendant SEVAN DERDERIAN (hereinafter "DERDERIAN") was and is a
 18 resident of the County of Los Angeles, State of California.

19 5. Plaintiff is unaware of the true names and capacities,
 20 whether corporate, associate, individual, or otherwise, of defendants
 21 named as DOES I through X, inclusive. Pursuant to Code of Civil
 22 Procedure Section 474, plaintiff will seek leave of court to amend
 23 this complaint to state said defendants' true names and capacities
 24 when the same have been ascertained. Plaintiff is informed and
 25 believes and based upon such information and belief alleges that said
 26 fictitiously-named defendants are responsible in some manner for the

1 injury and damages to plaintiffs as further hereinafter alleged.

2 AGENCY

3 6. Plaintiff is informed and believes and upon such information
4 and belief alleges that defendants, and each of them, at all times
5 herein mentioned were the agents, employees, servants, joint
6 venturers, and/or co-conspirators of the remaining defendants, and
7 were acting in the course and scope of such agency, employment, joint
8 venture, and/or conspiracy; that defendants, and each of them, were
9 doing the things herein alleged, were the actual and/or ostensible
10 agents of the remaining defendants and were acting within the course
11 and scope of said agency; and that each and every defendant, as
12 aforesaid, when acting as a principal, was negligent in selecting,
13 hiring, supervising and continuing the employment of each and every
14 defendant as an agent, employee or joint venturer; and/or that said
15 defendants approved, supported, participated in, authorized, and/or
16 ratified the acts and/or omissions of said employees, agents,
17 servants, conspirators, and/or joint venturers.

18 FACTS

19 Plaintiff's Competent Performance in the Internet Domain
20 Industry, and Hire by Defendant UNIREGISTRY:

21 7. At all material times, plaintiff has been a single woman,
22 dependent on herself for her livelihood. For the approximate ten year
23 period prior to her hire by defendant UNIREGISTRY, plaintiff had been
24 employed in sales and executive sales positions in the internet domain
25 industry. She maintained an excellent reputation, and had never been
26 subject to significant criticisms regarding her sales performance or

1 terminated for cause.

2 8. In August of 2014, plaintiff had been employed for
3 approximately one year as a Senior Account Executive for Muses and
4 Visionaries, a high end women's publication. At that time she learned
5 of an opening for Director of Business Development at defendant
6 UNIREGISTRY. Plaintiff was familiar with Frank Schilling
7 ("Schilling"), its CEO, and contacted him regarding possible
8 employment. Following a number of communications, emails and
9 conversations, on or about August 28, 2014 plaintiff was offered a
10 position with defendant UNIREGISTRY as Director of Business
11 Development. Plaintiff was expressly assured that her focus would be
12 outside sales. She was offered a base salary of \$80,000.00, with
13 commissions at an amount to be determined.

14 Defendant DERDERIAN's Sexual Harassment of Plaintiff:

15 9. From the outset of plaintiff's employment with defendant
16 UNIREGISTRY, she experienced offensive and unwelcome harassment based
17 primarily on her gender by her Supervisor, defendant DERDERIAN, Vice
18 President of Sales. This consisted of, but was not limited to the
19 following:

20 a) At a domain name conference nearly immediately after plaintiff
21 started her employment, listing plaintiff as his "spouse" at the hotel
22 at which the conference was being held;

23 b) Telling plaintiff that she was "hot" and should put her
24 picture on her emails to help get clients;

25 c) Telling plaintiff that she should spend time with him outside
26 of work to assist him in "getting women;"

1 d) On multiple occasions describing his and other executives'
2 activities of throwing money at strippers in strip clubs;

3 e) Watching call girl and escort websites on his work computer
4 and tilting the screen in plaintiff's direction to attempt to get
5 plaintiff to watch pictures of nearly nude women; and,

6 f) Sending texts to plaintiff stating, "text me and I'll send you
7 a naughty picture that I just took."

8 10. In addition to his sexually offensive conduct toward
9 plaintiff, defendant DERDERIAN also engaged in a pattern of harassment
10 and intimidation toward plaintiff in an apparent attempt to
11 demonstrate his power and control. This included, but was not limited
12 to the following:

13 a) Micro managing plaintiff in the details of her daily work,
14 such as demanding that he see all emails that she sent out;

15 b) Denying plaintiff the use of brand new computers which were
16 made available to the other male sales people, and requiring plaintiff
17 to use an old computer;

18 c) Frequently changing plaintiff's password on her work email,
19 thereby sabotaging her performance by preventing her from sending and
20 receiving necessary emails;

21 d) Threatening to fire plaintiff for handling a sales lead that
22 had been given to her by the CEO;

23 e) Restricting plaintiff's access from the customer database;

24 f) Preventing plaintiff from leaving the office to meet clients
25 in the field;

26 ///

1 g) Failing to inform plaintiff of promotional rates which would
2 have facilitated her sales; and

3 h) Denying plaintiff the use of a promised company phone for two
4 months.

5 Defendant UNIREGISTRY's Adverse Actions Toward Plaintiff in
6 Retaliation for Plaintiff's Having Engaged in the Protected Activity
7 of Protesting Such Harassment:

8 11. Beginning in mid November of 2014, plaintiff complained to
9 Schilling and to other members of the upper management of defendant
10 UNIREGISTRY regarding defendant DERDERIAN's sexual and gender based
11 harassment. This included a formal written complaint dated November
12 19, 2014 to Schilling, in which plaintiff described defendant
13 DERDERIAN's abusive, offensive and retaliatory conduct, such as
14 threatening plaintiff that he would "make her job very difficult" if
15 she went above him with her complaints.

16 12. Plaintiff also complained to Michael Ward ("Ward"), Director
17 of Operations, regarding defendant DERDERIAN's abusive and harassing
18 conduct. Ward observed this behavior on at least one occasion, and
19 advised defendant DERDERIAN to "knock it off and leave her alone!"
20 However, no remedial action was taken despite plaintiff's complaints.

21 13. In December of 2014, plaintiff became aware that over 21
22 fraudulent online credit applications with various credit card
23 companies had been submitted in her name. Plaintiff obtained copies
24 of her credit report and filed complaints with the Boynton Beach
25 Police Department and the Laguna Beach Police Department. Plaintiff
26 also advised Francisco Obispo ("Obispo"), Chief Technology Officer,

1 and Bret Fausett ("Fausett"), General Counsel, that she believed that
2 defendant DERDERIAN was responsible for these applications and that he
3 had invaded her right of privacy. Plaintiff was told that there would
4 be an investigation regarding this issue; however no investigation was
5 conducted to plaintiff's knowledge.

6 14. On December 24, 2014, plaintiff noted that her personal
7 information had been used without her consent to set up a fraudulent
8 credit monitoring service. Again plaintiff complained to Obispo, to
9 no avail. Thereafter, plaintiff learned that fraudulent address
10 changes had been made to her credit report. Plaintiff complained to
11 Obispo regarding this, however no investigation was conducted.

12 15. In January of 2015, plaintiff noted that her access to the
13 customer database had been restricted by defendant DERDERIAN,
14 preventing her from accessing customer leads. Plaintiff met with
15 Fausett regarding this issue, again to no avail. Fausett told
16 plaintiff, "different managers have different styles."

17 16. In January of 2015, approximately one month after the
18 initial fraudulent credit applications had been submitted in
19 plaintiff's name, plaintiff discovered that another fraudulent credit
20 application had been submitted approximately one day after plaintiff's
21 complaint to the management of defendant UNIREGISTRY regarding her
22 belief that this had been done by defendant DERDERIAN. Again, there
23 was no investigation conducted.

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1 17. At a domain conference in mid January of 2015, plaintiff
2 received a text message from defendant DERDERIAN with offensive sexual
3 content. Plaintiff showed the message to Obispo, again to no avail.
4 There was no investigation conducted.

5 18. In February of 2015, plaintiff noted that a number of
6 customer leads had been taken from her sales lead list and were given
7 to defendant DERDERIAN. Plaintiff brought this to the attention of
8 Vern Jurovich ("Jurovich"), COO. Jurovich acknowledged that it was
9 not right, but took no remedial action.

10 19. In March of 2015, defendant DERDERIAN allocated only 14 out
11 of approximately 300 sales leads to plaintiff. The remaining sales
12 leads were taken by defendant DERDERIAN and given to plaintiff's male
13 counterparts. Plaintiff brought this to the attention of Jurovich,
14 and once again no remedial action was taken.

15 20. On March 23, 2015, plaintiff was invited by Ward to
16 participate in a Skype call. During this call, Ward told plaintiff,
17 "today is your last day. Your numbers did not meet expectations."
18 Plaintiff had never been given any sales quotas, and Ward gave no
19 other explanation for her termination.

20 21. Plaintiff experienced severe depression, anxiety, insomnia
21 and severe mental and emotional distress as a result of her
22 termination. Despite a diligent job search, plaintiff was unable to
23 find employment in Southern California. Plaintiff was compelled to
24 incur moving expenses, and moved to Florida in August of 2015.
25 Plaintiff ultimately found other employment following a lengthy job
26 search, however earning less income than she had made with defendant

1 UNIREGISTRY.

2 EXHAUSTION OF ADMINISTRATIVE REMEDIES

3 22. On January 19, 2016, plaintiff filed a complaint against
4 defendants with the Department of Fair Employment and Housing
5 ("DFEH"). Plaintiff's complaint was co-filed with the DFEH and the
6 EEOC. A copy thereof is attached hereto as Exhibit A. Thereafter on
7 February 6, 2018, the DFEH issued a "right to sue" letter following
8 the completion of the EEOC investigation. A copy thereof is attached
9 hereto as Exhibit B. Plaintiff has therefore exhausted her
10 administrative remedies as a precondition to filing this claim.

11 FIRST CAUSE OF ACTION

12 (Sexual Harassment (Gov. Code, § 12940(j))
13 Against Defendants DERDERIAN and UNIREGISTRY)

14 23. Plaintiff hereby realleges and incorporates by reference
15 paragraphs 1 through 22 as if set forth in full.

16 24. By virtue of the conduct described at paragraphs 9(a)
17 through 9(f) above, defendant DERDERIAN, individually and in his
18 managerial capacity on behalf of defendant UNIREGISTRY, created a
19 hostile and offensive work environment for plaintiff based on
20 plaintiff's gender, and sexually harassed plaintiff, in violation of
21 Government Code, § 12940(j). Said conduct was unwelcome and offensive
22 to plaintiff. Pursuant to the "continuing violation" doctrine,
23 plaintiff's claims should be deemed timely filed with respect to all
24 such harassment. Richards v. CH2M Hill, Inc. (2001) 26 Cal.4th 798.

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1 25. As a direct and proximate result of said sexual harassment,
2 plaintiff sustained general damages for severe mental and emotional
3 distress in sums prayed.

4 26. Defendant DERDERIAN acted with malice and oppression toward
5 plaintiff and with conscious and wanton disregard of plaintiff's
6 rights, and defendant DERDERIAN's conduct was impliedly authorized by
7 defendant UNIREGISTRY by its failure to take remedial action despite
8 plaintiff's complaints. Defendants DERDERIAN and UNIREGISTRY should
9 therefore be assessed punitive and exemplary damages in sums
10 sufficient to punish them and set an example in view of their
11 respective financial conditions.

12 27. Plaintiff is further entitled to an award of statutory
13 attorneys' fees pursuant to Government Code, § 12965(b).

14 SECOND CAUSE OF ACTION

15 (Retaliation (Gov. Code, § 12940(h))
16 Against Defendant UNIREGISTRY)

17 28. Plaintiff hereby realleges and incorporates by reference
18 paragraphs 1 through 22 as if set forth in full.

19 29. By virtue of the conduct described at paragraphs 11 through
20 above, defendant UNIREGISTRY engaged in conduct that materially
21 affected the terms and conditions of plaintiff's employment, thereby
22 constituting adverse actions, including but not limited to terminating
23 plaintiff for false and pretextual reasons. A substantial motivating
24 factor in the decision to terminate plaintiff was retaliatory animus
25 based on plaintiff's having engaged in the protected activity of
26 complaining about sexual harassment, in violation of Government Code,

1 § 12940(h).

2 30. As a direct and proximate result of said retaliation,
3 plaintiff sustained economic damages for past and future loss of
4 earnings and benefits, moving expenses, and additional consequential
5 damages, according to proof.

6 31. As a further direct and proximate result of said
7 retaliation, plaintiff sustained general damages for severe mental and
8 emotional distress in sums prayed.

9 32. Defendant UNIREGISTRY acted with malice and oppression
10 toward plaintiff and with conscious and wanton disregard of
11 plaintiff's rights, and defendant UNIREGISTRY should therefore be
12 assessed punitive and exemplary damages in sums sufficient to punish
13 it and set an example in view of its financial condition.

14 33. Plaintiff is further entitled to an award of statutory
15 attorneys' fees pursuant to Government Code, § 12965(b).

16 PRAYER

17 WHEREFORE plaintiff prays judgment against defendants as follows:

18 As to the First Cause of Action:

- 19 1. For general damages, according to proof;
20 2. For punitive damages, according to proof;
21 3. For statutory attorneys' fees.

22 As to the Second Cause of Action:

- 23 1. For economic damages, according to proof;
24 2. For general damages, according to proof;
25 3. For punitive damages, according to proof;
26 4. For statutory attorneys' fees.


27 11

28 COMPLAINT FOR SEXUAL HARASSMENT (GOV. CODE, § 12940(j)); RETALIATION
(GOV. CODE, § 12940(h)); JURY TRIAL DEMAND

As to Both Causes of Action:

1. For costs of suit incurred;
2. For such further relief as the Court deems proper.

Dated: July 24, 2018


WILLIAM M. CROSBY
Attorney for Plaintiff
NATALIE LAMBERT

JURY TRIAL DEMAND

Plaintiff NATALIE LAMBERT hereby demands trial by jury of the
above cause.

Dated: July 24, 2018


WILLIAM M. CROSBY
Attorney for Plaintiff
NATALIE LAMBERT

EXHIBIT A

EXHIBIT 2

Jan 15 16 05:10p

DICK LAMBERT, RPI

581.732.0000

P.2

EEOC Form 611(1/12)

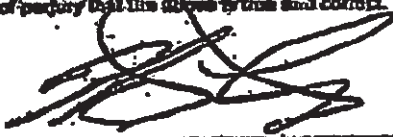
CHARGE OF DISCRIMINATION This form is utilized by the Policy Act of 1974. See enclosed Policy Act. Statement and other information before completing this form.		Charge Presented To: <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC		Agency(ies) Charge No(s): 480-2015-03412	
California Department of Fair Employment & Housing and EEOC <i>State or local Agency, if any</i>					
Name (Please Print, Mr., Mrs.) Mrs. Natalie Lambert			Home Phone (incl. Area Code) (561) 292-8687		Date of Birth:
Street Address Po Box 4176, Boynton Beach, FL 33424			City, State and ZIP Code		
Named to the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others: (If more than one, list under PARTICULARS below.)					
Name UNIREGISTRY, INC			No. Employees, Members 15 - 100		Phone No. (include Area Code) (949) 247-6707
Street Address 2151 San Joaquin Hills Rd, Newport Beach, CA 92658			City, State and ZIP Code		
Name			No. Employees, Members		Phone No. (include Area Code)
Street Address			City, State and ZIP Code		
DISCRIMINATION BASED ON (Check appropriate box(es)) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input checked="" type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)			DATE(S) DISCRIMINATION TOOK PLACE Dated: 03-23-2015 Lated: 03-23-2015 <input type="checkbox"/> CONTINUING ACTION		
THE PARTICULARS ARE (If additional paper is needed, attach extra sheets): I. I have been employed by Uniregistry since on or about October 2014, most recently as the Director of Business Development. Since hired I have been constantly harassed by Sevan Derderian (Sevan) in that he often prevented me from doing my job, and I was told by Sevan that I should put a pic of me in my email because I was hot and that it would help me get business, told by various co-workers about trips they took to strip clubs. On or about November 2014, I complained to Frank Schilling (CEO) about Sevan and nothing was done. Subsequently Sevan found out and threatened me by telling me he was going to make my job very difficult. I have also been subjected to different terms and conditions of employment in that when I was at a conference in Las Vegas I was not advised of a special rate that I could have used to increase my sales. I also feel that the laptop that was given to me (originally Sevan's) had tracking software and my personal passwords and private information was collected. This was in turn used to antagonize me by Sevan when he would use my password in awkward sentences.					
I want this charge filed with both the EEOC and the State or local Agency, if any. I will notify the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct.			NOTARY - When necessary for State and Local Agency Requirements I swear or affirm that I have read the above and the contents are true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT JAN 19 2016 SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year) EEOC/LADO INTAKE		
Date Dec 17, 2015			Charge Party Signature 		

EXHIBIT 2

Jan 15, 16 05:10p

DICK LAMBERI, KPI

661.792.0000

P.3

EEOC Form 5-7(12B)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

☐ FEPA
☒ EEOC

480-2015-03412

California Department Of Fair Employment & Housing

and EEOC

State or local Agency, if any

telling me know that he knew my information. On or about March 23, 2016, I was discharged.

- II. No reason was given to me for the above acts of discrimination.
- III. I believe I have been discriminated against due to my sex (female), in retaliation for complaining to Frank Schilling in Nov 2014, and because of my disability, which are in violation of Title VII of The Civil Rights Act of 1964, as amended and the Americans with Disabilities Act of 1990, as amended.

RECEIVED

JAN 15 2016

EEOC/LADO

INTAKE

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Dec 17, 2015

Date

Charging Party Signature

NOTARY - Upon receipt for State and Local Agency Responsibility

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE

(month, day, year)

EXHIBIT 2

EXHIBIT B

EXHIBIT 2

EEOC Form 191 (11/16)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: Natalie Lambert
P O Box 4178
Boynton Beach, FL 33424

From: Los Angeles District Office
255 E. Temple St. 4th Floor
Los Angeles, CA 90012



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(e))

EEOC Charge No.

EEOC Representative

Telephone No.

480-2015-03412

Jacqueline Escobar,
Investigator

(213) 894-1000

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge.



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred **more than 2 years (3 years)** before you file suit may not be collectible.

Enclosure(s)

On behalf of the Commissioner

Rosa M. Viramontes,
District Director

(Date Mailed)

cc: Stacey Judah, Paralegal
Scott Wagner and Associates, P.A.
250 S. Central Blvd. #104A
Jupiter, FL 33458

Lori Ocheltree, Esq.
Duane Morris, LLP
Spear Tower
One Market Plaza, Suite 2200
San Francisco, CA 94105-1127



STATE OF CALIFORNIA | Equal, Labor, and Housing Agency

GOVERNOR EDMUND G. BROWN, JR.

DIRECTOR PHYLIS W. CHENG

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | Videophone 916-228-6285 | TTY 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

Frank Schilling
Chief Executive Officer
UNIREGISTRY, INC
4840 Admiralty Way Floor 5
Marina Del Rey, CA 90292

EEOC Number 480-2015-03412C
Case Name Natalie Lambert
Filing Date January 19, 2016

NOTICE TO COMPLAINANT AND RESPONDENT

This is to advise you that the above-referenced complaint is being dual filed with the California Department of Fair Employment and Housing (DFEH) by the U.S. Equal Employment Opportunity Commission (EEOC). The complaint will be filed in accordance with California Government Code section 12960. This notice constitutes service pursuant to Government Code section 12962.

The EEOC is responsible for the processing of this complaint and the DFEH will not be conducting an investigation into this matter. Please contact EEOC directly for any discussion of the complaint or the investigation.

NOTICE TO COMPLAINANT OF RIGHT TO SUE

This letter is also your Right to Sue notice. This Right to Sue Notice allows you to file a private lawsuit in State court. According to Government Code section 12965, subdivision (b), you may bring a civil action under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The lawsuit may be filed in a State of California Superior Court. Government Code section 12965, subdivision (b), provides that such a civil action must be brought within one year from the date of this notice. Pursuant to Government Code section 12965, subdivision (d)(1), this one-year period will be tolled during the pendency of the EEOC's investigation of your complaint. You should consult an attorney to determine with accuracy the date by which a civil action must be filed. This right to file a civil action may be waived in the event a settlement agreement is signed.

Be advised, the DFEH does not retain case records beyond three years after a complaint is filed.

DFEH-200-02 (07/13)